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May 25, 2016

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Ms. Louanne Gross
United States Environmental Protection Agency
Region 4, Wetlands Enforcement Section
Sam Nunn Atlanta Federal Center
61 Forsyth Street, SW
Atlanta, GA 30303-8960

RE: **Evelyn S. Merritt, and Sharon L. Merritt McMillen as Trustee of the Merritt
Living Trust v. Sunflower Farm & Ranch, Inc.**
Superior Court of Jefferson County
Civil Action File No.: 116-CV-00074

Dear Ms. Gross:

Pursuant to O.C.G.A. §50-18-70, also known as Georgia's Open Record Act, please consider this a request for production of documents and materials maintained by your office regarding the following:

1. any and all documents pertaining to appraisals, citations, complaints, communications, inspections, investigations, opinions, photographs, reports, testing and work orders involving any run-offs, evasions, sediment or other contaminations related to the property at or near Sunflower Farm & Ranch, Inc., Georgia Highway No. 24, New Fleming Road, Wrens, Jefferson County, Georgia 30833;
2. all communications and complaints to and from Evelyn S. Merritt, Sharon C. Merritt-McMillan, Joy Cotton, and Joan Human; and
3. all communications with any agent or employer of other state, local or federal government entities regarding the investigation related to the property at or near Sunflower Farm & Ranch, Inc., Georgia Highway No. 24, New Fleming Road, Wrens, Jefferson County, Georgia 30833.

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Pursuant to Georgia law (O.C.G.A. § 9-11-34(c)), this method of obtaining documents applies to persons or entities not involved in the lawsuit. Please forward the requested records and materials to the attention of Jodi Pruitt. We will, of course, reimburse you for any necessary expenses incurred in responding to the request, in advance, if necessary.

Your assistance with this matter is greatly appreciated. Should you require any additional information or have any questions, please feel free to contact me. My direct dial is (404) 870-7440.

Very truly yours,

Jodi W. Pruitt
Paralegal